

STATEMENT IN SUPPORT OF PROBABLE CAUSE

IN RE: **HARVEY, Ladainmium**

I, **Bernardo Trad**, declare and state as follows:

On April 3rd 2018, at approximately 2:00 A.M., United States (U.S.) Border Patrol Agents (BPAs) assigned to the Laredo North Border Patrol immigration checkpoint located near mile marker 29 of Interstate Highway 35 north of Laredo, Texas, encountered Ladainmium HARVEY, a United States Citizen, at the primary tractor-trailer immigration inspection lane. HARVEY approached the immigration checkpoint driving a white tractor with loaded flatbed trailer attached.

As HARVEY approached the immigration checkpoint the BPA manning the primary tractor-trailer immigration inspection lane observed two (2) persons laying down in the top bunk bed of the tractor cabin. As HARVEY came to a halt, he was asked if there was anyone else in the back of the tractor, to which he stated "no". The BPA reiterated if HARVEY was driving with a co-driver, to which HARVEY once again stated "no". Subsequently a BPA and his service canine alerted to possible narcotics and/or concealed humans near the sleeper area of the tractor. At this point HARVEY was asked to step out of the tractor to allow the BPA to search the sleeper area of the tractor.

The search of the tractor resulted in the discovery of a total of nine (9) Subjects within the sleeper area of the tractor. A fully loaded handgun was also discovered on the floor between the driver seat and the sleeping area of the tractor. After a brief immigration inspection, it was determined that the Subjects discovered in the trailer were undocumented aliens (UDAs) illegally present in the U.S.

HARVEY and the nine (9) UDAs were placed under arrest and escorted inside the checkpoint for processing. Homeland Security Investigation (HSI) Laredo agents were contacted and notified of the failed human smuggling attempt.

HSI Laredo agents responded to the Laredo North immigration checkpoint to interview all subjects involved in the smuggling attempt.

HARVEY was read his Miranda Rights in the English language which HARVEY acknowledged and agreed to provide a statement without the presence of an attorney. HARVEY stated he was to be paid one-thousand (\$1,000.00) U.S. dollars to transport the UDAs to an undisclosed location near San Antonio, Texas. Once HARVEY successfully smuggled the UDAs through the Border Patrol Checkpoint, he was going to receive instructions as to where to go. HARVEY states he was given two-hundred (\$200.00) U.S. dollars to pay for gas.

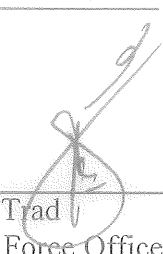
HSI Laredo agents interviewed Mexican nationals Jose Missael FIGUEROA-Arambula, and Jose Adrian GUTIERREZ-Zaragoza whom are held as material witnesses against HARVEY.

FIGUEROA-Arambula stated he arranged with an unknown human smuggler to be smuggled to North Carolina for three thousand (\$3,000.00) U.S. Dollars. GUTIERREZ-Zaragoza stated he arranged with an unknown human smuggler be taken to North Carolina for seven thousand five hundred (\$7,500.00) U.S. Dollars.

Both FIGUEROA-Arambula and GUTIERREZ-Zaragoza positively identified HARVEY via six-person photo array as the driver of the failed human smuggling attempt.

HSI Laredo took custody of HARVEY and will be charging him with violations of Title 8 United States Code, Section 1324, Alien Smuggling. HARVEY will be held at the Webb County Jail pending his initial appearance before a Magistrate Judge of the Southern District of Texas on April 4, 2018.

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on the 3rd day of April, 2018.



Bernardo Trad
HSI Task Force Officer
Homeland Security Investigations

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer.

Executed on the _____ day of _____, _____.

UNITED STATES MAGISTRATE JUDGE